



May 14, 2014

VIA IBFS

Jose Albuquerque, Chief
Satellite Division
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Application of ORBCOMM License Corp. For Authority to
Modify its Non-Voice, Non-Geostationary Satellite Service
Space Segment License (S2103) to Revise the Next-Generation
Satellite Deployment Plan**

File No. SAT-MOD-20111021-00207

File No. SAT-AMD-20120809-00125

File No. SAT-AMD-20130212-00020

File No. SAT-AMD-20140016-00006

Dear Dr. Albuquerque:

By this submission, ORBCOMM License Corp. (“ORBCOMM”) respectfully requests extension of the partial milestone waiver granted by the Chief of the Satellite Policy Branch on March 26, 2014 (the “Partial Waiver”), in connection with the launch of ORBCOMM Generation 2 (“OG2”) satellites and disposition of the above-referenced modification application.¹ The OG2 launch scheduled for May 10, 2014, on a Space Exploration Technologies Corp. (“SpaceX”) Falcon 9 v1.1 rocket was postponed after SpaceX scrubbed the static fire test scheduled for May 9, 2014. Based on the latest available information, May 27, 2014, is the earliest possible date for rescheduling the launch. The Partial Waiver is currently set to expire only four days later on May 31, 2014.²

Given that launch schedule delays that are beyond the control of payload owners are commonplace occurrences in the space industry, and in the interest of administrative efficiency, ORBCOMM requests that the Partial Waiver be extended until September 30, 2014. Grant of

¹ *Stamp Grant, Slip Op. at 2*, File Nos. SAT-MOD-20111021-00207 (Granted in part /Deferred in part) & SAT-AMD-20140016-00006 (Granted), FCC International Bureau, Satellite Division, Satellite Policy Branch, March 26, 2014, 2012, *FCC Public Notice*, Report No. SAT-01006, released March 28, 2014.

² *Id.*



**Jose Albuquerque, Chief
Satellite Division
International Bureau
Federal Communications Commission
May 14, 2014
Page 2 of 2**

this request will remove uncertainty regarding the authorization status of the OG2 satellites that are subject to the Partial Waiver and would be consistent with precedent concerning launch milestone extensions granted due to factors beyond the control of the FCC licensee.³ Furthermore, although ORBCOMM expects that the launch will occur well before the end of September 2014, grant of the requested Partial Waiver extension, should also ensure that valuable Commission staff time will not have to be expended revisiting this matter. Accordingly, grant of this request will serve the public interest, convenience, and necessity.

Kindly direct any inquiries concerning this submission to the undersigned.

Respectfully submitted,



Walter H. Sonnenfeldt, Esq.
Regulatory Counsel
ORBCOMM License Corp. &
Vice President, Regulatory Affairs
ORBCOMM Inc.
Direct Tel: (585) 461-3018
E-Mail: sonnenfeldt.walter@orbcomm.com

³ See, e.g., *Intelsat LLC*, 19 FCC Rcd 5266 (March 22, 2004), at ¶ 7.